

The Supreme Court has repeatedly defined monopoly power as "the power to control prices or exclude competition" within the relevant market at issue.¹³⁴ The existence of monopoly power is generally inferred from a firm's "possession of a predominant share" of the relevant market.¹³⁵ In regulated industries, predominant market share is an important "point of departure," but analysis should "focus directly upon the ability of the regulated firm to control prices or exclude competition."¹³⁶ That focus requires scrutiny of "the realities" of the applicable regulatory scheme, particularly when pricing and interconnection decisions are left in the hands of the regulated firm "in the first instance" and the regulatory agencies are "not always able to respond to alleged abuses immediately and effectively."¹³⁷

Analysis of entry barriers also is of fundamental importance in examining monopoly power in a regulated industry. In this regard, it is well established that costs and delays imposed by the regulatory process itself are entry barriers without regard to the "innocence or blameworthiness" of the regulated monopolist for such problems: "Any market condition that makes entry more costly or time-consuming and thus reduces the effectiveness of potential competitors as a constraint on the pricing behavior of the dominant firm should be

¹³⁴Eastman Kodak Co. v. Image Technical Services, Inc., 504 U.S. 451, 481 (1992); United States v. Grinnell Corp., 384 U.S. 563, 570 (1966).

¹³⁵Image Technical Services, 504 U.S. at 464.

¹³⁶Southern Pacific Communications Co. v. A.T. & T., 740 F.2d 980, 1000 (D.C. Cir. 1984); MCI Communications Corp. v. A.T.& T., 708 F.2d 1081, 1106-07 (7th Cir.), cert. denied, 464 U.S. 891 (1983).

¹³⁷Southern Pacific Communications, 740 F.2d at 1001. Ameritech argues that its future ability to exercise monopoly power in Michigan local exchange markets is constrained by its subjection to regulatory oversight. Arguments of this sort have not fared well over the long course of antitrust litigation in this industry. See, e.g., United States v. AT&T, 524 F. Supp. 1336, 1345-48 (D.D.C. 1981); United States v. Western Electric Co., 673 F. Supp. 525, 567-79 (D.D.C. 1987).

considered a barrier to entry, regardless of who is responsible for the existence of that condition.”¹³⁸

Presently in Michigan local governments create significant barriers to entry by requiring TCG and other CLECs to pay higher fees for access to municipal rights of way than Ameritech does. TCG has protested this situation¹³⁹ pointing out that the Act explicitly requires local government to treat competitors in a nondiscriminatory manner. Section 253(a) says “No State or local statute or regulation, or other State or local legal requirement, may prohibit or have the effect of prohibiting the ability of any entity to provide any interstate or intrastate telecommunications service.” Section 253(c) upholds the authority of a State or local government to “manage the public rights-of-way or to require fair and reasonable compensation from telecommunications providers, on a competitively neutral and nondiscriminatory basis, for use of public rights-of-way on a nondiscriminatory basis...”

It is also well established that a dominant firm’s control over “essential facilities” -- access to which is essential to a would-be rival’s ability to compete in the relevant market -- is a critical entry barrier, one that is often sufficient in itself to confer monopoly power.¹⁴⁰ Given Ameritech’s overwhelming market shares in local exchange markets throughout Michigan, the continued existence of high barriers to entry and expansion by smaller rivals, and Ameritech’s continued control over essential facilities, the above-cited precedents compel

¹³⁸Southern Pacific Communications, 740 F.2d at 1001 (emphasis supplied).

¹³⁹TCG Detroit v City of Dearborn, Case No. 96-CV-74338-DT, (US Dist Ct, Eastern Dist of MI), Complaint filed September 13, 1996.

¹⁴⁰See generally United States v. Terminal Railroad Assoc., 224 U.S. 383 (1912); Otter Tail Power Co. v. United States, 410 U.S. 336, 377 (1973); see also City of Cleveland v. Cleveland Electric Illuminating Co., 734 F.2d 1157, 1168 (6th Cir.), cert. denied, 469 U.S. 884 (1984) (essential facilities confer “ability to exclude competition, the second test of monopoly power”).

application of a strong presumption that Ameritech still retains monopoly power over these local exchange markets. The burden thus falls on Ameritech to present persuasive evidence overcoming that presumption before the grant of its application can be found in the public interest. A mere "paper" showing of interconnection agreements in place, checklist actions and other such matters cannot suffice. They are all necessary but far from sufficient proof that these markets have become truly open and effectively competitive. The acid test is whether smaller rivals have developed a meaningful presence in these markets and have become effective constraints upon Ameritech's ability to act anticompetitively. Clearly, they have not.

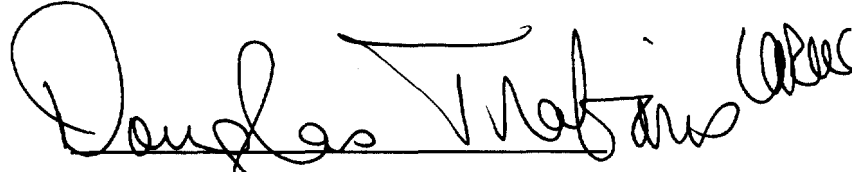
VIII. CONCLUSION

For the reasons stated herein, the Commission should deny Ameritech's application.

Respectfully submitted,

TELEPORT COMMUNICATIONS GROUP INC.

By



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Its Attorneys

June 10, 1997

EXHIBIT A

STATE OF MICHIGAN)
) SS
COUNTY OF OAKLAND)

AFFIDAVIT

Michael Pelletier, being first duly sworn, deposes and says that:

1. I am Director, Carrier Relations for Teleport Communications Group Inc. ("TCG").
2. I have been employed by TCG performing these duties since June 3, 1996.
3. Prior to joining TCG, I was employed by Ameritech for twenty-eight (28) years, with responsibilities for a portion of that time relating to business relations with competitive providers of basic local exchange services, such as TCG Detroit.
4. I am responsible for negotiating and implementing interconnection agreements with incumbent local exchange carriers on behalf of TCG and its state operating affiliates in a number of states, including the State of Michigan.
5. I am therefore personally aware of whether, and to what extent, and under what rates, terms, and conditions Ameritech Michigan is providing interconnection to TCG Detroit in the State of Michigan.
6. I have reviewed the relevant portions of the Application of Ameritech Michigan for Provision of In-Region, InterLATA Services in Michigan, filed with the Federal Communications Commission ("FCC") on May 21, 1997.
7. It is my opinion that Ameritech Michigan's submissions to the MPSC and the FCC do not provide accurate information in several instances regarding TCG Detroit on whether competitive check list items are currently available, and whether they are in fact implemented.
8. Ameritech asserts that it has opened interfaces or gateways to these Operations Support Systems ("OSS") functions and made them available to TCG, including pre-ordering, ordering, provisioning, maintenance and repair, and billing electronic interfaces. TCG is currently using electronic interfaces only for the processing of orders through ASR.
9. TCG is not currently using the electronic interface for maintenance and repair. Ameritech has informed TCG that the electronic interface for maintenance and repair cannot be utilized in conjunction with the channels that TCG orders pursuant to

Ameritech's access tariffs. Ameritech provided TCG with an 800 number to be used to report trouble for DS1s and DS3s. My experience using the 800 number provided by Ameritech to report trouble is that a response can take up to a half an hour.

10. Ameritech has installed trunks to carry traffic from Ameritech's network to TCG's network in such a way that there is a single point of failure at each of the points of interconnection (POI) between the two networks. Local traffic originating on Ameritech's network to TCG is being blocked in Ameritech's network behind Ameritech's tandem. The creation of a single point of failure between the two networks is contrary to TCG policy for its own network deployment, and contrary to TCG's request.
11. TCG has become aware of the blocking problem only through customer complaints because the source of blocking is in Ameritech's network behind the tandem. Once TCG became aware of a pattern of customer traffic being blocked, TCG requested the data it needs from Ameritech to diagnose and request correction of the problem. Specifically, TCG requested (1) the percentage of trunk groups blocked by route in Ameritech's network, (2) traffic usage data for each TCG NXX to determine which TCG traffic by NXX is getting blocked, and (3) the point(s) in Ameritech's network where the blocking is occurring. Ameritech has not provided the data requested.
12. On April 23, 1997 representatives of Ameritech met with TCG to address the trunk blocking problem between Ameritech and TCG networks, among other issues. TCG outlined a proposed solution to the trunk blocking problem.
13. On May 1, 1997, representatives of Ameritech met with TCG to discuss the status of interconnection between Ameritech and TCG networks in the region. At that meeting a proposed resolution to the trunk blocking problems was discussed. The attached letter dated May 9, 1997 was sent to Ameritech to memorialize TCG's understanding of the proposed changes to the interconnection arrangements between Ameritech and TCG to correct the blocking problems.
14. On May 16, 1997 Ameritech Illinois filed a response to an oral TCG discovery request stating that "The network reconfiguration mentioned in [Micken's] testimony is actually occurring in Michigan."¹ Ameritech has agreed to utilize some TCG transmission facilities to alleviate the blocking of TCG traffic to TCG's Detroit switch, but has not implemented any part of a proposed solution utilizing Ameritech facilities. In addition, no timetable to implement a solution in Detroit has been established.
15. On May 22, 1997 representatives of Ameritech met with TCG to address the status of the

¹ Ameritech Illinois' Response to Oral Data Request Dated 5/6/97, ICC Docket No. 96-0404.

trunk blocking problem, specifically, implementation of the solution to the problem. TCG found that none of the steps committed to by Ameritech at the April 23rd meeting had been implemented at all, or in the agreed upon manner.

16. It is my understanding that Ameritech had agreed to provide trunk group specific traffic data necessary for TCG to assess the trunk blocking problems in Detroit and Chicago, specifically usage, peg, and overflow counts. On May 22, 1997 Ameritech retracted that agreement and indicated that instead it is using automated message accounting (AMA) records to evaluate the blocking problem. It is inappropriate to use AMA records because they are billing-only records in which blocked calls are not recorded, and provide no useful information regarding the traffic inbound to TCG's network that is being blocked in Ameritech's network. Ameritech does not use AMA data to engineer the Ameritech network.
17. TCG had requested, and received agreement from Ameritech at the April 23rd meeting, that the first part of the solution to the blocking problem would involve implementing trunks from Ameritech's end-offices to TCG's switch. Ameritech agreed that it would route traffic as a first choice via these direct end office trunk groups. TCG found out at the May 22nd meeting that Ameritech refuses to implement this agreed-upon solution in several ways.
18. Ameritech has identified 54 Direct End Office Trunk groups equaling 2,784 trunks.² Ameritech indicated at the May 22nd meeting that trunk groups from the end-offices through which the greatest volume of traffic in-bound to TCG passes to TCG's switch could not be established because no additional T1 terminations were available. Ameritech indicated that it would not give priority to make additional terminations available for TCG trunks, despite the occurrence of blocked traffic originating from specific Ameritech end-offices. Ameritech indicated that terminations would be made available for TCG trunks on a first come, first served basis. The lack of prioritization to make additional terminations available for trunks to alleviate blocked traffic is not consistent with Ameritech's trunk engineering of its own network.
19. Ameritech indicated at the May 22nd meeting that it had commenced establishing trunk groups from its end offices to TCG's switch based on an alphabetical listing of Ameritech end offices. TCG understood that the prioritization of Ameritech end offices to have trunk groups established to TCG's switch would be on the basis of traffic volume. The result of this prioritization scheme is that the Ameritech end offices through which the greatest volume of traffic in-bound to TCG passes are not alleviated until less used routes are provided with unnecessary redundancy.

²*Ibid.*

20. TCG had requested, and received agreement from Ameritech at the April 23rd meeting, that the second part of the solution to the blocking problem would be to establish trunk groups between each TCG Point of Interconnection (POI) and each Ameritech tandem switch. Ameritech agreed to route traffic as an alternate route through Ameritech tandems to the TCG POI, and as a second alternate route via intermachine trunks (IMT) between Ameritech tandems where Ameritech has multiple tandems. Ameritech indicated at the May 22nd meeting that it had not agreed to establish these trunk groups and that TCG's request was "still under advisement."
21. TCG had requested, and received agreement from Ameritech at the April 23rd meeting, that the routing for TCG NXXs would be changed from the present routing in which each TCG NXX is routed only to a specific Ameritech tandem. Ameritech agreed to route TCG NXXs in such a way that each NXX could be routed to each Ameritech tandem. Ameritech indicated at the May 22nd meeting that TCG NXXs can only be routed so that each NXX is routed to one tandem.
22. TCG had requested, and received agreement from Ameritech at the April 23rd meeting, that the currently existing one-way trunk groups carrying segregated local and toll traffic between TCG's switch and Ameritech tandems would be combined into one-way trunks carrying both local and toll trunks. Percent Local Usage (PLU) factors would not be established, but rather, billing would occur based on call records. In addition, trunk groups to be established between Ameritech end offices and TCG's switch would be two-way trunk groups carrying combined local and toll traffic. Ameritech indicated at the May 22nd meeting that it now refuses to provide two-way trunk groups both between Ameritech's tandem and TCG's switch, and between Ameritech end offices and TCG's switch.
23. Ameritech's traffic blocking problem has been harming TCG through both loss of revenues and damage to its reputation for months. Despite TCG's repeated notifications to Ameritech, and TCG's diligent effort to find a solution for more than six months, the problem persists in Ameritech's network. Ameritech's response to TCG's requests have been utterly inadequate. Essentially, all that Ameritech has done is to hold a series of meetings between TCG and different Ameritech representatives. These meetings have been ineffective. Different Ameritech representatives attend each meeting, each with no knowledge of agreements arrived at during previous meetings resulting in a lack of continuity on Ameritech's part from meeting to meeting.
24. Based upon my knowledge of, and my long career at Ameritech, it is my opinion that their failure to solve the network blocking problem in a reasonably timely manner is likely to be intentionally anti-competitive behavior. I know that Ameritech grooms its network and is capable of correcting network blocking problems affecting its customers in a matter of days. However, correcting the blocking of TCG traffic is apparently taking many months, if not years. Clearly, Ameritech is not providing TCG interconnection that

is at least equal in quality to that provided to itself, any subsidiary and affiliate.

25. TCG has requested from Ameritech detailed service quality and performance reporting, as well as a more formal process to manage and monitor TCG's and Ameritech's mutual networks.³ Ameritech has not responded to the request except to provide TCG with a quality of service and performance report that does not contain the level of detailed information useful for TCG.⁴ The reports provided to TCG do not allow TCG to understand how the quality of service and performance provided by Ameritech compares to the quality of service and performance provided to other CLECs interconnected with Ameritech.
26. The type of negotiation and achievement of understanding with Consolidated Communications Telecom, Inc. (CCT) regarding operating, communication and reporting procedures described by Ameritech has not been experienced by TCG.⁵ TCG's experience attempting to communicate with Ameritech regarding standards, reporting and procedures, is that TCG personnel at all levels of TCG's organization have made numerous requests, both verbally and in writing, to numerous personnel at AIIS. These requests have been systematically ignored.
27. Ameritech claims that it provides unbundled local transport as standard offerings in the form of dedicated and shared interoffice transmission.⁶ All unbundled access facilities ordered and currently used by TCG were ordered from Ameritech's existing access tariffs, specifically, DS-1s and DS-3s. I am unaware of the availability of Ameritech's DS1 and DS3 Services from any source other than Ameritech's Access Tariff. I am unaware of the availability of Ameritech's OC-3, OC-12, and OC-48 Services on an unbundled basis. I am unaware of any unbundled offering of interoffice transmission facilities that has been made available to TCG.
28. Ameritech claims that TCG has purchased signaling and access to call related databases from Ameritech.⁷ TCG has neither requested nor purchased signaling and access to call related databases from Ameritech.
29. Ameritech has failed to remit payments to TCG despite being invoiced for the

³See letter from Catherine M. Mason, Vice-President/Operations, TCG Illinois, to Ray Thomas, General Manager-AIIS, attached as Exhibit C.

⁴See, e.g., "Teleport/Ameritech Illinois, Quality Initiative Analysis Report for March 1997, attached as Exhibit D.

⁵Affidavit of Warren Mickens at 22-4.

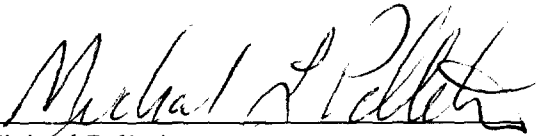
⁶Ameritech Michigan's Brief at 44.

⁷*Ibid.* at 50.

termination of Ameritech originated traffic. Ameritech has demanded billing records more onerous and inconsistent with the measurement requirements in the TCG/Ameritech Agreement, and has neglected to remit local compensation payments to TCG despite being provided with the billing records demanded.

30. The process used by Ameritech to load data from TCG into its 911 database has not been demonstrably shown to be error free, or that it can be maintained error-free on a going forward basis. Prior indications of errors in the Ameritech database were investigated by TCG, resulting in the discovery that the database contained multiple errors resulting from improper loading of the data by Ameritech. TCG provided a total reload of data to Ameritech to correct the database. The need to reload the data base has resulted in a lack of confidence in the future integrity of the database. TCG has not received confirmation that the process Ameritech uses to load the database has been corrected, or that the existing database is now error free.
31. TCG Detroit requested on numerous occasions when intraLATA 1+ dialing parity would become available in Michigan. AIIS informed me that intraLATA 1+ dialing parity was implemented in only 80% of its exchanges. In addition, I was informed that no further implementation of 1+ dialing parity will take place until ACI obtains approval to provide interLATA service in Michigan.

IN WITNESS WHEREOF, I have hereunto set my name and seal this 9th day of June,
1997.

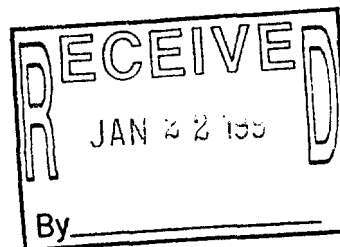

Michael Pelletier

Subscribed and sworn to before me
this 9th day of June, 1997.


Notary Public

PEGGY A. SHIELDS
Notary Public, Wayne County, MI
My Comm. Expires March 2, 2000
My Commission Expires _____.

EXHIBIT B



Teleport Communications Group
7630 S. Chester Street, Suite 300
Englewood, Colorado 80111

January 21, 1997

Elizabeth Howland
TCG Regulatory

Hello Liz,

Below you will find four orders which demonstrate the problem addressed in your letter. I have also attached our TCG/Ameritech December, 1996 Provisioning Results Report, which addresses missed FOC dates.

TCG notifies their customers and completes their engineering based on the FOC date received from the LEC. When Ameritech misses the FOC date it causes a hardship for our customers. Ameritech's policy of re-FOCing orders appears to be an attempt to deny us the waiver of the installation charges and to eschew their due date on time provisioning results. Per tariff Ameritech is to waive all installation charges if the FOCed date is not met.

DTRP 9700065 was FOCed on 12-20-96 with a due date of 1-14-97. On 1-09-97 we were re-FOCed with a due date of 1-27-97. We were verbally notified of the new FOC on 1-09-97. An update: Ameritech notified us on 1-21-97 that they were re-FOCing us again with a 2-07-97 FOC date.

DTRP 9700063 was FOCed on 1-02-97 with a due date of 1-07-97. On 1-08-97 we were re-FOCed with a due date of 2-07-97. We were verbally notified of the new FOC on 1-08-97.

DTRP 9700058 was FOCed on 12-16-96 with a due date of 1-07-97. On 1-09-97 we were re-FOC with a due date of 2-07-97. We were verbally notified of the new FOC on 1-08-97.

DTRP 9601123 was FOCed on 12-19-96 with a due date of 1-08-97. On 1-08-97 we were verbally notified of a new FOC date of 2-06-97. We received the new FOC on 1-20-97.

In all of the above examples Ameritech did not adhere to their original FOC date.


Lou Hart

cc: Bill Beans
cc: Victory De Joy

Attachment:

**TCG/AMERITECH
DECEMBER, 1998
PROVISIONING RESULTS**

JOB TYPE	JOBS	FOCS DUE	FOCS ON TIME	FOCS LATE	AVE FOC INTERVAL	FOC ON TIME PERCENTAGE	ORDERS DUE	DUE DATE MET	DUE DATE LATE	AVE DUE DATE INTERVAL	ON TIME PERCENTAGE
DETROIT	37	37	31	6	2.65	83.78%	37	20	17	6.19	54.05%
MILWAUKEE	25	25	19	6	2.80	76.00%	25	15	10	2.80	60.00%
INDIANAPOLIS	16	16	15	1	1.75	93.75%	16	8	8	2.06	50.00%
CHICAGO	29	29	28	1	1.55	96.55%	29	3	25	7.14	10.34%
TOTAL	107	107	93	14		86.92%	107	46	60		42.99%

EXHIBIT C

TCG

January 24, 1997

Cathy Mason
VP Operations

Teleport Communications Group
Sears Tower
233 South Wacker Drive
Suite 2100
Chicago, IL 60606
Tel: 312.705.9856
Fax: 312.705.9836

Ray Thomas
General Manager - AIIS
350 N. Orleans Flr. 3
Chicago, IL
60654

Dear Ray,

Thank you for your 1/22 letter detailing the chronology for the Wabash Tandem upgrade. As you know we requested incremental capacity in all these Tandems on 12/20 following the Northbrook blockage problem. By the way, we're still looking for the same chronology for the 12/5-12/20 problem. Please send ASAP.

As a vehicle for improved coordination and communication, we've requested a number of times a more formal process to manage and monitor our mutual networks. In a review of interconnection and how we have been managing thus far. I think you'll agree this requires closer attention. In addition, we need to wrap-in the monthly performance reports. (I have not received any since September). In doing so, we are confident the process will run more smoothly.

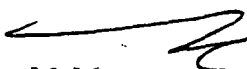
To this end, enclosed please find a Monthly Report summarizing the following:

- Installation performance
- Ongoing service performance
- Grade of service
- Forecasting/Capacity management

We would like to begin with 1/97 performance immediately. In so doing, we will eliminate many of the problems we have experienced thus far.

Thanks in advance for your support. We look forward to a successful 1997 with Ameritech.

Sincerely,



Catherine M. Mason
Vice-President/Operations
TCG - Chicago

EXHIBIT D

TELEPORT- REGIONAL/AMERITECH

(Illinois, Michigan, Wisconsin, Indiana)

QUALITY INITIATIVE ANALYSIS REPORT

FOR

MARCH 1997

Teleport-Regional Communications

G R O U P

(Illinois, Michigan, Wisconsin, Indiana)

ANALYSIS OF REPORTS - SUMMARY

March 1997

ALL REPORTS

<u>Source</u>	<u>MAR</u>	<u>%</u>
Auto-Detect	7	6.0%
Customer	87	75.0%
Assist Test & Release	19	16.4%
Other	3	2.6%
Total	116	100.0%

<u>Resolution</u>	<u>MAR</u>	<u>%</u>
Came Clear	1	0.9%
Central Office Trouble	9	7.8%
CPE-Customer	18	15.5%
Customer Assist & Release	19	16.4%
Facilities	11	9.5%
NPC	0	0.0%
No Trouble Found	9	7.8%
Other (Auto Detect, Perf-Mon, IEC, INF)	46	39.7%
Telco-Customer Prem	0	0.0%
Test Ok	3	2.6%
Total	116	100.0%

<u>Cause</u>	<u>MAR</u>	<u>%</u>
Defective Amrtch. Equipment	13	11.2%
Non-Telephone Co. Employee	0	0.0%
Amrtch. Emp. Inst. Related	7	6.0%
Amrtch. Emp. Non-Inst. Related	0	0.0%
Unknown (NTF, CC, TOK)	13	11.2%
Customer Assist & Release	19	16.4%
Teleport or End User Trouble	18	15.5%
Other (Auto Detect, Perf-Mon, IEC, INF)	46	39.7%
Weather	0	0.0%
Total	116	100.0%

CONFIDENTIAL

Solely for use by employees of Ameritech who have a need to know. Not to be disclosed to or used by any other person.

Teleport-Regional Communications G R O U P

(Illinois, Michigan, Wisconsin, Indiana)

ANALYSIS OF REPORTS - SUMMARY

March 1997

MEASURED REPORTS

(Reports That Appear On The Graphs)

<u>Source</u>	<u>MAR</u>	<u>%</u>
Customer	33	100.0%
Total	33	100.0%

<u>Resolution</u>	<u>MAR</u>	<u>%</u>
Central Office Trouble	9	27.3%
Facilities	11	33.3%
NPC	0	0.0%
Other (TOK, CC, NTF)	13	39.4%
Telco-Customer Prem	0	0.0%
Total	33	100.0%

<u>Cause</u>	<u>MAR</u>	<u>%</u>
Defective Amrtch. Equipment	13	39.4%
Non-Telephone Co. Employee	0	0.0%
Amrtch. Emp. Inst. Related	7	21.2%
Amrtch. Emp. Non-Inst. Related	0	0.0%
Unknown (TOK, CC, NTF)	13	39.4%
Weather	0	0.0%
Total	33	100.0%

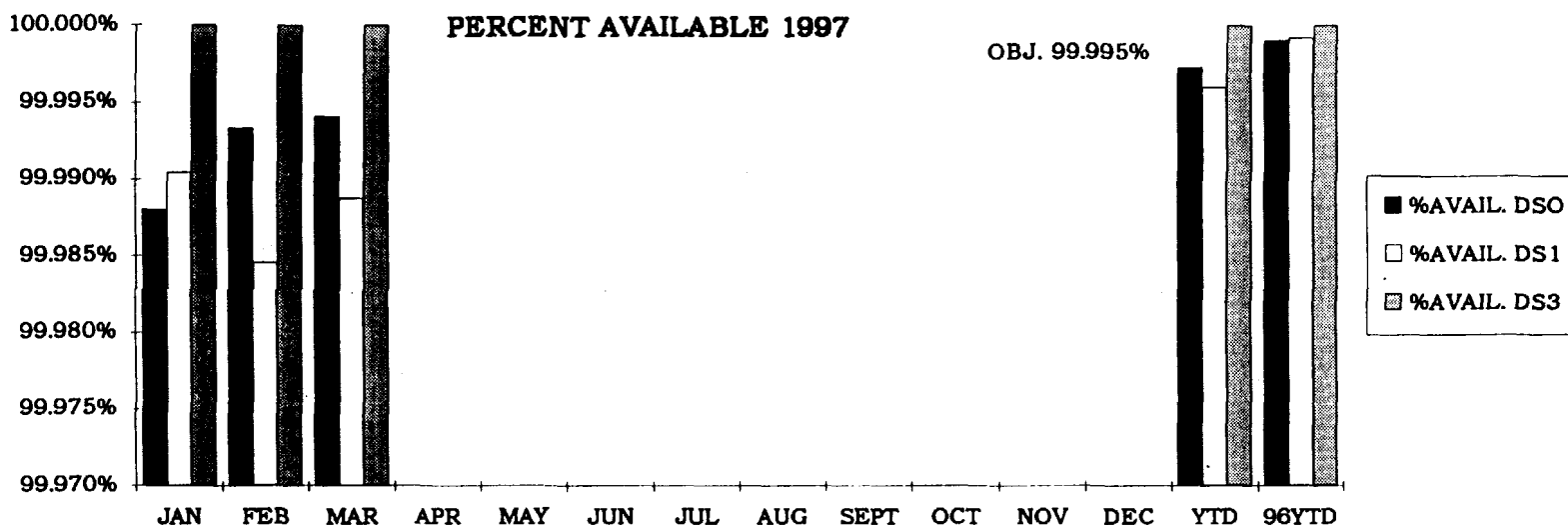
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Teleport-Regional Communications

G R O U P

(Illinois, Michigan, Wisconsin, Indiana)



Circuits in Svc+

DS0	222	226	230
DS1/T1	1252	1342	1481
DS3/T3	60	72	77

+ Includes cross connects

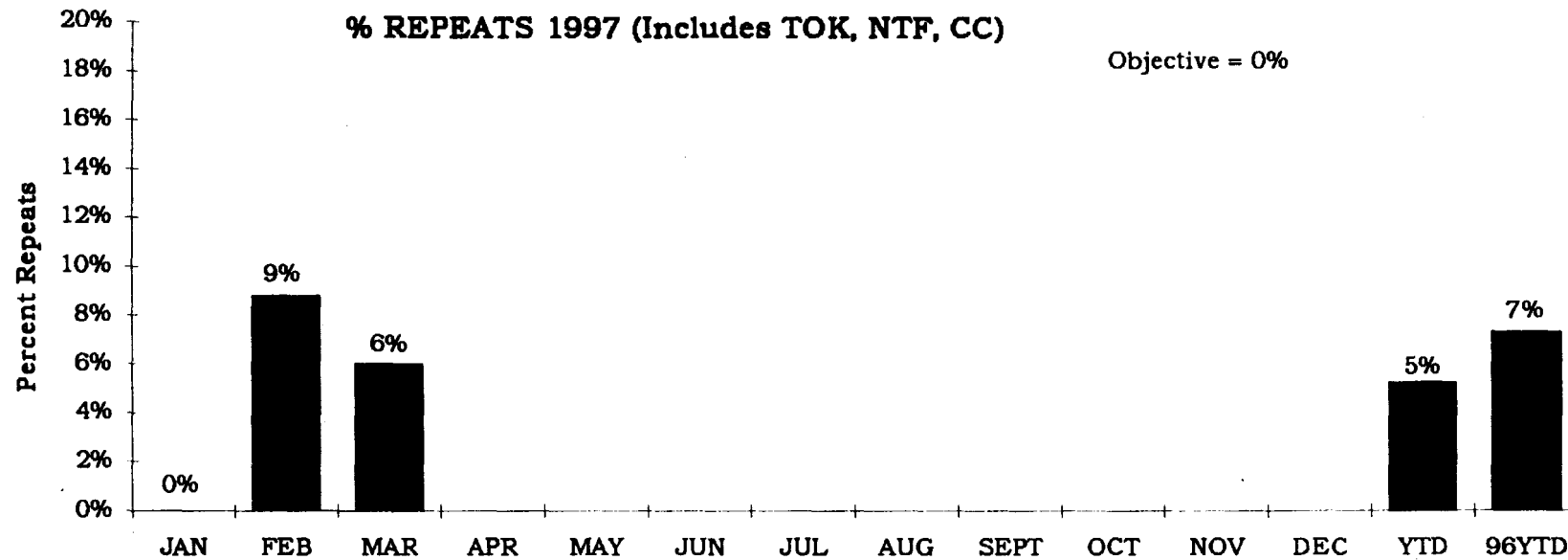
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Teleport-Regional Communications

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(Illinois, Michigan, Wisconsin, Indiana)

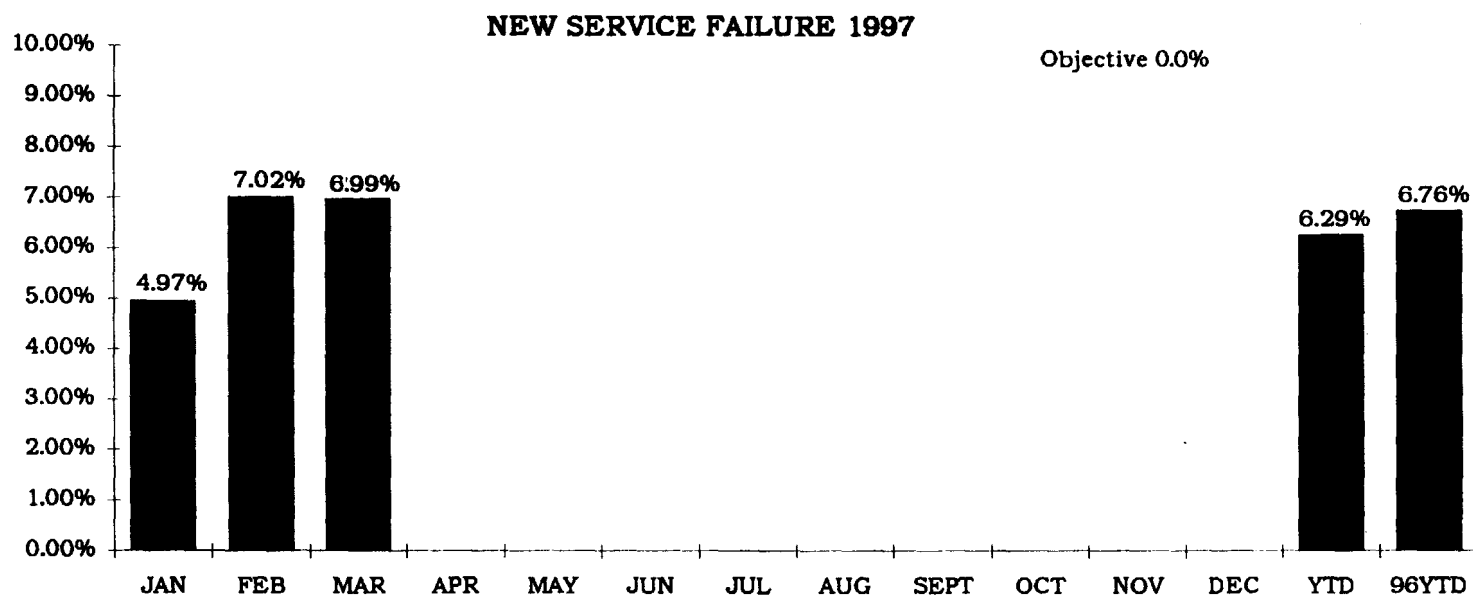


# of Reports	28	34	33										95	258
# of Repeats	0	3	2										5	19
Circuit Type														
DS0	0	3	0										3	0
DS1/T1	0	0	2										2	19
DS3/T3	0	0	0										0	0

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Teleport-Regional Communications
G R O U P
 (Illinois, Michigan, Wisconsin, Indiana)



# of New Svc Adds	161	114	186													461	1080
Trbls on New Svc	8	8	13													29	73
Total Troubles	28	34	33													95	258

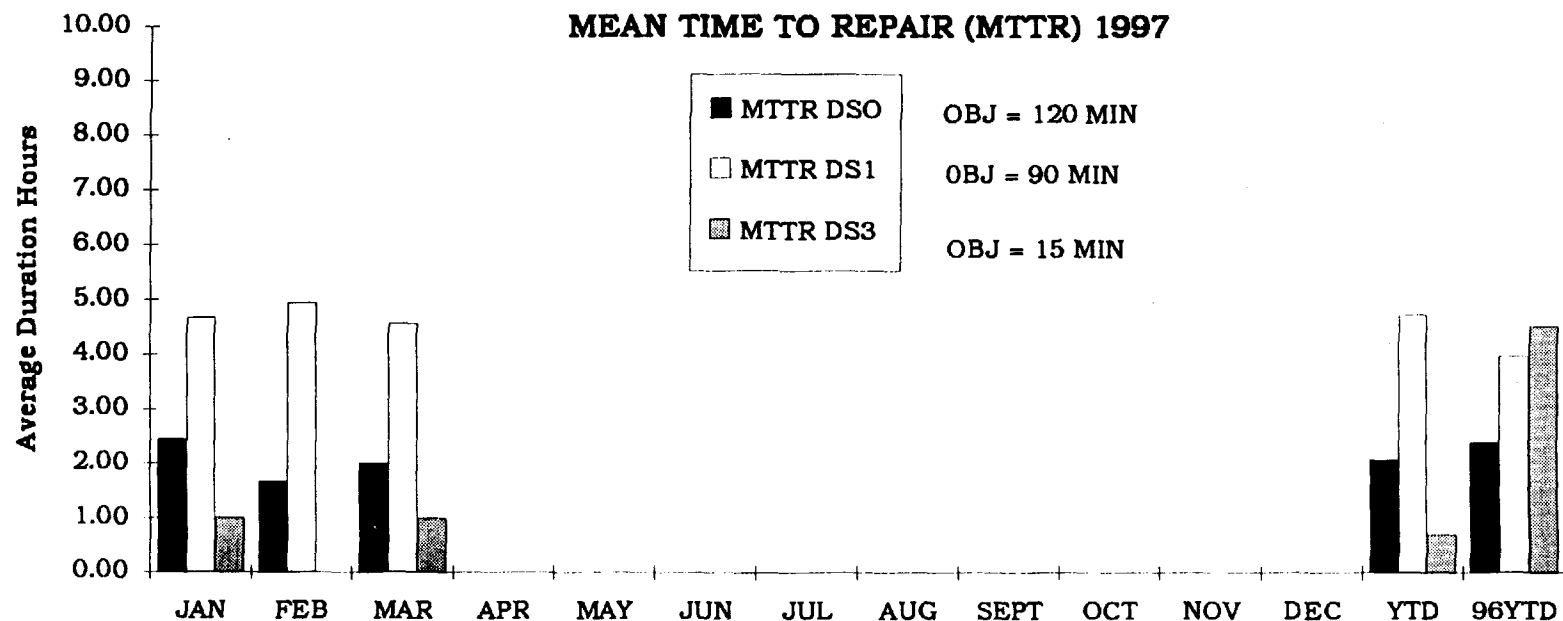
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G R O U P

(Illinois, Michigan, Wisconsin, Indiana)



# of Trbls	28	34	33	95	258
Duration Hrs	109.51	148.81	133.92	392.24	920.35
Avg Duration	3.91	4.38	4.06	4.13	3.57
# OF DS0 TRBLS	8	6	5	19	70
DURATION HRS	19.68	10.08	10.07	39.83	167.95
AVG DURATION	2.46	1.68	2.01	2.10	2.40
# OF DS1/T1 TRBLS	19	28	27	74	184
DURATION HRS	88.82	138.73	123.45	351.00	734.20
AVG DURATION	4.67	4.95	4.57	4.74	3.99
# OF DS3/T3 TRBLS	1	0	1	2	4
DURATION HRS	1.01	0	0.40	1.41	18.20
AVG DURATION	1.01	0.00	0.40	0.71	4.55

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